

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)	
)	
CUMMINGS MANOOKIAN, PLLC,)	Case No. 3:19-bk-07235
Debtor.)	Chapter 7
)	Judge Walker
JEANNE ANN BURTON, TRUSTEE,)	
Plaintiff,)	
)	
v.)	
)	
HAGH LAW, PLLC; AFSOON)	
HAGH; MANOOKIAN, PLLC; and)	
FIRST-CITIZENS BANK & TRUST)	
COMPANY,)	
Defendants.)	
)	Adv. Proc. No. 3:20-ap-90002

NOTICE OF DEPOSITION OF MELISSA FITZGERALD

Pursuant to Federal Rules of Bankruptcy Procedure 7026 and 7030 Jeanne Ann Burton, Chapter 7 Trustee and Plaintiff in this action, respectfully gives notice that she will take the deposition of Melissa Fitzgerald, on April 17, 2025, beginning at 10:00 a.m. Central time via Zoom Video Conference. A link to the conference has been sent to counsel for all parties and to the witness; any other party wishing to participate in the deposition should contact undersigned counsel. The deposition will be recorded by stenographic and/or videographic means. The topics to be addressed in the deposition are any nonprivileged matters relevant to any party's claims or defenses, pursuant to Rule 26(b)(1) of the Federal Rules of Civil Procedure made applicable to this matter by Rule 7026 of the Federal Rules of Bankruptcy Procedure. The Trustee anticipates addressing the following topics:

- Ms. Fitzgerald's knowledge of the representation of her interests by the Debtor and/or any other law firm in a case related to the wrongful death of a minor

Dated: April 10, 2025

Respectfully Submitted,

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.

Thompson Burton PLLC

One Franklin Park

6100 Tower Circle, Suite 200

Franklin, TN 37067

Tel: 615.465.6008

Fax: 615.807.3048

Email: phillip@thompsonburton.com

Special Counsel for Jeanne Ann Burton,
Trustee

Certificate of Service

The undersigned hereby certifies that a true and exact copy of the foregoing has been served via electronic notice/ECF on all parties having made an appearance herein.

This 10th day of April, 2025.

/s/ Phillip G. Young, Jr.

Phillip G. Young, Jr.